

Representation on the Draft Spelthorne Local Plan 2022-2037  
Pre- Submission.

By

LOSRA (Lower Sunbury Residents Association)

LOSRA is a long established (50 yrs) and well-respected residents' association. The Association's purpose is to optimise and enhance the quality of life for Lower Sunbury residents and one of our key strategies and objectives is to "press for the preservation and extension of Green Belt and public open space". See <https://www.losra.org/about-losra/losras-aims>

In preparing this submission, we have collaborated closely with Keep Kempton Green, whose principal objective is to defend Kempton Park, rated Strongly Performing Green Belt, against any possible residential development now or in the future, and we have shared legal advice. LOSRA strongly supports KKG's submission.

There are currently in the order of 4,500 households in the Lower Sunbury area. The Draft Local Plan would increase the number of households in the area by some 770, of which some 270 would be on five separate Green Belt sites totalling approx. 8.5 hectares of existing Green Belt land. Despite the Association's concern and general opposition to any Green Belt land being proposed for development, the Association appreciates and understands the serious problems that the Borough has had in trying to accommodate the ridiculous and out of date housing target of 618dpa set by Central Government. As stated in the Foreword to the Draft Local Plan, that Standard Method uses household growth projections almost a decade old. If subsequent projections were used, the 618 figure would be reduced to 347 per annum – 44 per cent lower. The Standard Method therefore hugely overstates the housing need in Spelthorne. Also, as set out in the Foreword, to achieve the 618 figure has required very difficult compromises across

the Borough. The sentiments expressed in the Foreword accurately encapsulate those felt by residents throughout the Borough. The Association agrees with the views as expressed in the Foreword. The Association has never supported the development of our precious Green Belt and the proposals contained within the draft plan are inimical to our published objectives. Nevertheless, if the impossibly high figure of 618 dpa is to be achieved we have no option but to accept that modest sacrifices are required to be made, and in the spirit of that compromise and with the urgent need to get an approved Local Plan on the statute books the Association is prepared to support the Local Plan as set out in the Pre-Submission.

We believe, as set out in the IDP, that there are still some unresolved infrastructure issues, particularly related to financing the extra burden the additional population will put on health, education, social services and transport. Lower Sunbury has felt the burden of substantial cumulative development over the past decade or so, none of which has been mitigated by the provision of extra healthcare, educational or other infrastructural facilities, with the result that, for example, the Sunbury Health Centre is one of the most over-subscribed health centres in England; one particularly large development resulted in the loss of a very large public open space in the centre of the village; and there has been growing pressure on school places in Sunbury.

In Lower Sunbury alone the additional households will likely result in an increase in population of some 1,800 – nearly a 20% increase over the plan period. That excludes coping with the additional numbers who will be using the schools and health facilities in Lower Sunbury from other areas. The proposed 6<sup>th</sup> Form College, whilst a welcome development from the perspective of the provision of additional choice for pupils from the local area, is likely to attract additional traffic at peak periods.

However, so far as we can assess from the information available, we believe the plan to be sustainable and as stated above support it.

There have been various attempts/approaches by developers to try to obtain planning approval for housing developments on larger Green Belt sites in Lower Sunbury, both at Kempton Park and at Stratton Road. Development of either of these two sites would have a much more significant impact in terms of loss of Green Belt land and infrastructure requirements – in the case of Kempton Park specifically, the additional traffic that any development would impose on the already overburdened A308 in both directions towards Hampton Court and Sunbury Cross/Staines would be intolerable. No evidence has ever been produced to show that this could be mitigated. The Association and other local residents' groups would very strongly oppose the development of either of these two sites. If, as undoubtably they will, either of the sites are promoted by developers at the Examination in public, the Association would ask that we be given the opportunity to set out its views to the Inspector.